

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

07-cv- 7130

AVROHOM WOLOWIK,

Plaintiff,

-against-

ANSWER TO
COMPLAINT

CONTROL CREDIT MANAGEMENT, INC.
FIRST ASSURANCE, AND
T-MOBILE,

Defendants

- - - - - X

Defendant, CONTROL CREDIT MANAGEMENT, INC., by its attorney Arthur Sanders, as and for its answer to the complaint of plaintiff, alleges as follows:

1. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "1" of the Complaint.

2. Defendant admits that the Court has jurisdiction over of this matter but otherwise denies the allegation contained in Paragraph "2" of the Complaint.

3. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "3" of the Complaint.

4. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "4" of the Complaint.

5. Defendant admits the allegation contained in Paragraph "5" of the Complaint.

6. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "6" of the Complaint.

7. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "7" of the Complaint.

8. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "8" of the Complaint.

9. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "9" of the Complaint and all of its sub-parts.

10. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "10" of the Complaint.

11. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "10" of the Complaint.

12. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "10" of the Complaint.

13. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "10" of the Complaint.

14. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "10" of the Complaint.

15. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "15" of the Complaint.

16. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "16" of the Complaint.

17. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "17" of the Complaint.

18. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "18" of the Complaint.

19. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "19" of the Complaint.

20. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in Paragraph "20" of the Complaint.

21. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "21" of the Complaint.

22. Defendant denies knowledge or information sufficient to form a belief with respect to the date plaintiff received letter, but otherwise denies the allegation contained in Paragraph "22" of the Complaint.

23. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "23" of the Complaint.

24. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "24" of the Complaint.

25. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "25" of the Complaint.

26. Defendant denies the allegation contained in Paragraph "26" of the Complaint.

27. Defendant denies the allegation contained in Paragraph "27" of the Complaint.

28. Defendant denies the allegation contained in Paragraph "28" of the Complaint.

29. Defendant denies the allegation contained in Paragraph "29" of the Complaint.

30. Defendant denies the allegation contained in Paragraph "30" of the Complaint.

31. Defendant denies the allegation contained in Paragraph "31" of the Complaint.

32. Defendant denies the allegation contained in Paragraph "32" of the Complaint.

33. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "33" of the Complaint.

34. Defendant denies the allegation contained in Paragraph "34" of the Complaint.

35. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "35" of the Complaint.

36. Defendant denies the allegation contained in Paragraph "36" of the Complaint.

37. Defendant denies the allegation contained in Paragraph "37" of the Complaint.

38. Defendant denies the allegation contained in Paragraph "38" of the Complaint.

39. Defendant denies the allegation contained in Paragraph "39" of the Complaint.

40. Defendant denies the allegation contained in Paragraph "40" of the Complaint.

41. Defendant denies the allegation contained in Paragraph "41" of the Complaint.

42. Defendant denies the allegation contained in Paragraph "42" of the Complaint.

43. Defendant denies the allegation contained in Paragraph "43" of the Complaint.

44. Defendant denies the allegation contained in Paragraph "44" of the Complaint.

45. Defendant denies the allegation contained in Paragraph "45" of the Complaint.

46. Defendant denies the allegation contained in Paragraph "46" of the Complaint.

47. Defendant denies the allegation contained in Paragraph "47" of the Complaint.

48. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "48" of the Complaint.

49. Defendant denies the allegation contained in Paragraph "49" of the Complaint.

50. Defendant denies the allegation contained in Paragraph "50" of the Complaint.

51. Defendant denies the allegation contained in Paragraph "51" of the Complaint.

52. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "52" of the Complaint.

53. Defendant denies the allegation contained in Paragraph "53" of the Complaint.

54. Defendant denies the allegation contained in Paragraph "54" of the Complaint.

55. Defendant denies the allegation contained in Paragraph "55" of the Complaint.

56. Defendant denies the allegation contained in Paragraph "56" of the Complaint.

57. Defendant denies knowledge or information sufficient to form a belief with respect to the allegation contained in Paragraph "57" of the Complaint.

58. Defendant denies the allegation contained in Paragraph "58" of the Complaint.

59. Defendant denies the allegation contained in Paragraph "59" of the Complaint.

60. Defendant denies the allegation contained in Paragraph "60" of the Complaint.

61. Defendant denies the allegation contained in Paragraph "61" of the Complaint.

WHEREFORE, defendant, CONTROL CREDIT MANAGEMENT, INC., requests Judgment dismissing the complaint with prejudice and denying all requested relief therein, together with such other and further relief as the Court deems just and proper, including costs and reasonable attorneys' fees.

Dated: Spring Valley, New York
October 1, 2007

/S/
ARTHUR SANDERS, ESQ. (AS-1210)
Attorney for defendant, CONTROL
CREDIT MANAGEMENT, INC.
2 Perlman Drive - Suite 301
Spring Valley NY 10977-5230
845-352-7272

TO: SCHMUEL KLEIN, ESQ.
Attorney for plaintiff
268 Route 59 West
Spring Valley NY 10977

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2007 the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and or the Southern District's Rules On Electronic Service upon the following parties and participants:

Schmuel Klein, Esq.

/S/_____
ARTHUR SANDERS